

# WILLKIE FARR & GALLAGHER<sub>LLP</sub>

1875 K Street, N.W.  
Washington, DC 20006-1238

Tel: 202 303 1000  
Fax: 202 303 2000

February 28, 2025

## VIA ECF

The Honorable Lewis J. Liman  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007

Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL (“Lively Case”); *Wayfarer Studios LLC et al. v. Lively et al.*, No. 1:25-cv-00449-LJL (“Wayfarer Case”)

Dear Judge Liman,

Counsel for Blake Lively writes in response to the February 28, 2025 letter submitted to the Court by counsel for the Wayfarer Parties as well as non-parties Wayfarer executive Tera Hanks and Wayfarer employees Milica Tošković and Jarriesse Blackmon. *See* Dkt. No. 103. Ms. Lively has issued party requests and subpoenas, for phone records and documents reflecting the alleged retaliatory scheme, directly to the Wayfarer Parties and third parties who were the subject of Ms. Lively’s initial subpoenas. In connection thereto, Ms. Lively has issued letters to each of AT&T, Verizon, and T-Mobile U.S. withdrawing the initial subpoenas and respectfully requests that the Court deny the motion filed by the Wayfarer Parties at Docket No. 103 as moot.

Respectfully submitted,

/s/ Michael J. Gottlieb

WILLKIE FARR & GALLAGHER LLP  
Michael J. Gottlieb  
Kristin E. Bender  
Meryl C. Governksi (*pro hac vice*)  
Willkie Farr & Gallagher  
1875 K Street NW  
Washington, DC 20006  
(202) 303-1000  
mgottlieb@willkie.com  
kbender@willkie.com  
mgovernski@willkie.com

Hon. Lewis J. Liman  
February 28, 2025

Aaron E. Nathan  
Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York, NY 10019  
(212) 728-8000  
anathan@willkie.com

MANATT, PHELPS & PHILLIPS, LLP  
Esra A. Hudson (*pro hac vice*)  
Stephanie A. Roeser (*pro hac vice*)  
Manatt, Phelps & Phillips LLP  
2049 Century Park East, Suite 1700  
Los Angeles, California 90067  
(310) 312-4000  
ehudson@manatt.com  
sroeser@manatt.com

Matthew F. Bruno  
Manatt, Phelps & Phillips, LLP  
7 Times Sq  
New York, NY 10036  
(212) 790-4500  
mbruno@manatt.com

*Attorneys for Blake Lively and Ryan Reynolds*